

CSM Legal, P.C.

60 East 42nd Street
Suite 4510
New York, NY 10165

Ph:(212) 317-1200

Fax:(212) 317-1620

Jorge Pavon Hernandez
52-74 79th Street 1st Floor
Flushing, NY
11373

March 24, 2022

Attention:

File #: GeminiDiner2

Inv #: Sample

RE: Pavon Hernandez et al v. Gemini Diner Inc. et al; :20-cv-04741

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Sep-01-20	reviewed status	0.10	12.50	PL
Sep-10-20	Reviewed court order scheduling initial conference via phone; directed staff to update case chart ; filed order in the proper folder for future reference	0.30	135.00	MF
Sep-15-20	Organizing individual defendants AOSs from process server	0.10	12.50	PL
Oct-15-20	Reviewed joint request for an extension of the discovery deadline; directed staff to update case chart ; filed orders in the proper folder for future reference	0.30	135.00	MF
Oct-19-20	reviewed magistrate's court order rescheduling case management conference via phone; directed staff to update case chart ; filed order in the proper folder for future reference	0.30	135.00	MF
	reviewed court order setting date for initial conference; directed staff to update case chart ; filed notice in the proper folder for future reference	0.30	135.00	MF
Nov-02-20	Reviewed Defendants' request for an extension of time to file answer to our complaint; directed staff to update case chart; filed notice in the proper folder for future reference	0.30	135.00	MF

Nov-04-20	Reviewed court order granting Defendants' request for an extension of time to file answer to our complaint; directed staff to update case chart; filed notice in the proper folder for future reference	0.30	135.00	MF
Nov-12-20	Reviewed proposed scheduling order filed in court; directed staff to update case chart; filed report in the proper folder for future reference	0.30	135.00	MF
	Draft initial disclosures and exhibits.	1.40	490.00	CE
	Draft 26(f) report.	0.40	140.00	CE
	Email communication with opposing counsel.	0.20	70.00	CE
	Review email from court.	0.10	35.00	CE
	Review revised CMP from opposing counsel.	0.40	140.00	CE
	Finalize and file proposed CMP.	0.40	140.00	CE
Nov-16-20	Review file and docket in preparation for initial conference.	0.60	210.00	CE
Nov-17-20	Attend initial conference.	0.40	140.00	CE
	Draft email to opposing counsel.	0.20	70.00	CE
	Review Answer.	0.60	210.00	CE
	Review previous cases with Gemini Diner for discovery and other issues.	0.80	280.00	CE
Nov-23-20	Review case management order.	0.10	35.00	CE
Dec-02-20	Phone call with opposing counsel.	0.20	70.00	CE
	Draft letter to court.	0.60	210.00	CE
	Draft email to opposing cosounsel.	0.10	35.00	CE
	Review email and edits from opposing counsel.	0.30	105.00	CE
	File letter to court.	0.20	70.00	CE

Dec-07-20	Draft email to opposing counsel.	0.10	35.00	CE
	Draft email to chambers.	0.10	35.00	CE
Dec-09-20	Preparation for pre settlement conference.	0.70	245.00	CE
	Attend pre settlement conference.	0.50	175.00	CE
Feb-03-21	Review folder in preparation for conference.	0.70	245.00	CE
	Attend conference.	0.30	105.00	CE
Feb-04-21	Reviewed magistrate's court order requiring parties to submit status report on a specific date; directed staff to update case chart ; filed notices in the proper folder for future reference	0.30	135.00	MF
Feb-16-21	Update client on status of case.	0.20	70.00	CE
Feb-23-21	Email correspondence with opposing counsel.	0.20	70.00	CE
Feb-24-21	Draft letter to Judge Wang.	0.20	70.00	CE
	Email correspondence with opposing counsel.	0.20	70.00	CE
Feb-26-21	File update letter.	0.20	70.00	CE
Mar-11-21	Preliminary review of discovery responses.	0.80	280.00	CE
	Review emails from opposing counsel.	0.20	70.00	CE
Mar-29-21	Detailed review of discovery production.	7.50	2,625.00	CE
	Draft memo to PL regarding discovery questions for plaintiffs.	0.60	210.00	CE
Mar-30-21	Review discovery demands.	0.40	140.00	CE
	Draft letter to Court.	0.20	70.00	CE
	Email correspondence with opposing counsel.	0.20	70.00	CE
	Finalize and file letter to court.	0.20	70.00	CE

Mar-31-21	Review ECF Notification.	0.10	35.00	CE
Apr-06-21	Review memo from PL regarding Plaintiffs' response to Defendants' discovery.	0.40	140.00	CE
Apr-30-21	Email correspondence with opposing counsel.	0.30	105.00	CE
	Draft and file status update letter.	0.30	105.00	CE
	Review discovery answer.	0.30	105.00	CE
May-05-21	Draft discovery responses.	2.40	840.00	CE
May-06-21	Research re objections.	2.10	735.00	CE
May-07-21	Draft discovery responses.	0.80	280.00	CE
May-11-21	Revise discovery responses.	0.30	105.00	CE
May-12-21	Revise discovery responses.	0.20	70.00	CE
May-13-21	Draft doc request responses.	2.60	910.00	CE
	Draft interrogatory responses for Alejandro Pavon.	0.90	315.00	CE
	Consult with PF regarding corrections to rog responses.	0.20	70.00	CE
May-14-21	Finalize and send discovery responses.	3.40	1,190.00	CE
May-20-21	Email correspondence with opposing counsel.	0.20	70.00	CE
	Email correspondence with Chambers.	0.10	35.00	CE
May-24-21	Email correspondence with opposing counsel.	0.20	70.00	CE
May-25-21	Revise calculations.	0.60	210.00	CE
	Corerspondence with opposing counsel.	0.20	70.00	CE
May-26-21	Preparation for pre settlement call.	0.50	175.00	CE
	Attend pre settlement conference.	0.40	140.00	CE

Jun-21-21	REview docket.	0.10	35.00	CE
Jun-22-21	Preparation for conference.	0.30	105.00	CE
	Attend conference.	0.70	245.00	CE
Jun-23-21	Phone call with Jorge Pavon.	0.30	105.00	CE
	Phone call with Alexis Bravo.	0.30	105.00	CE
Jun-24-21	Phone call with Alejandro Pavon.	0.30	105.00	CE
Jul-09-21	Email correspondence with opposing counsel.	0.30	105.00	CE
Jul-15-21	Email correspondence with opposing counsel.	0.20	70.00	CE
Jul-20-21	Preparation for pre settlement conference.	0.30	105.00	CE
	Attend conference.	0.50	175.00	CE
	Review order and advise clients.	0.20	70.00	CE
Nov-08-21	Draft new damages calculations	2.10	735.00	CE
	Make revisions to JPTO	0.40	140.00	CE
	Email correspondence with opposing counsel.	0.30	105.00	CE
	Draft exhibit list	0.40	140.00	CE
	Finalize and file JPTO	0.60	210.00	CE
	Email correspondence with opposing counsel.	0.20	70.00	CE
	Fix JPTO	0.30	105.00	CE
Nov-22-21	Draft jury instructions	2.10	735.00	CE
	Email correspondence with opposing counsel.	0.20	70.00	CE
	Make revisions to JPTO	0.30	105.00	CE
	Review Defendants' revisions to JPTO	0.10	35.00	CE

	Make revisions to proposed voir dire	0.40	140.00	CE
	Finalize and submit revised JPTO, Voir Dire, and Jury Instructions.	0.70	245.00	CE
Dec-01-21	Email correspondence with opposing counsel.	0.30	105.00	CE
Jan-25-22	Phone call with opposing counsel.	0.20	70.00	CE
	Phone call with plaintiffs.	0.20	70.00	CE
	Correspondence with opposing counsel.	0.10	35.00	CE
Jan-26-22	Phone call with opposing counsel.	0.20	70.00	CE
Feb-11-22	Email correspondence with opposing counsel.	0.20	70.00	CE
	Draft letter to Court	0.20	70.00	CE
Feb-22-22	Email correspondence with opposing counsel.	0.20	70.00	CE
Mar-02-22	Draft settlement agreement	0.40	140.00	CE
	Draft exhibits to settlement agreement	0.60	210.00	CE
	Email correspondence with opposing counsel	0.20	70.00	CE
Mar-24-22	Draft fairness letter	0.30	105.00	CE
	Preparation exhibits to fairness letter	0.30	105.00	CE
	Totals	54.60	<u>\$19,305.00</u>	
	Total Fee & Disbursements		<u>\$19,305.00</u>	
	Balance Now Due		<u>\$19,305.00</u>	